

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMO DEVELOPMENT, LLC,)
AMO MANUFACTURING USA, LLC,)
and AMO SALES AND SERVICE,)
INC.,)

Plaintiffs,)

v.)

C.A. No. 20-842-CFC-JLH

ALCON VISION, LLC, ALCON)
LABORATORIES, INC., and ALCON)
RESEARCH, LLC,)

Defendants.)

ALCON, INC., ALCON RESEARCH,)
LLC and ALCON VISION, LLC,)

Counterclaim-Plaintiffs,)

v.)

AMO DEVELOPMENT, LLC,)
AMO MANUFACTURING USA, LLC,)
AMO SALES AND SERVICE, INC.)
and JOHNSON & JOHNSON)
SURGICAL VISION, INC.,)

Counterclaim-Defendants.)

**ALCON'S MOTION FOR SUMMARY JUDGMENT (NO. 2) THAT ONLY
AMO DEVELOPMENT, LLC IS ENTITLED TO ACTUAL DAMAGES**

Pursuant to Federal Rule of Civil Procedure 56, Defendants Alcon Vision, LLC, Alcon Laboratories, Inc., and Alcon Research, LLC (“Alcon”) respectfully move for summary judgment on Plaintiffs AMO Development, LLC, AMO Manufacturing USA, LLC, and AMO Sales and Service, Inc.’s claim for lost profits related to copyright infringement. The grounds for this motion are fully set forth in Alcon’s Brief in Support of its Motion for Summary Judgment (No. 2) That Only AMO Development, LLC is Entitled to Actual Damages, and a proposed order is attached hereto.

WHEREFORE, Alcon respectfully requests that the Court grant this Motion and enter the proposed order attached hereto.

Respectfully Submitted,

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